

Q&A with Charles Hall following his video presentation on European markets

1. Question about threshold for labeling a product GM based on ingredients in list – my advice is if avoidable, DO NOT export a product containing a GM ingredient, even if less than .9% of list. Get an expert opinion from FAS minister counselor!

The labeling requirement does not apply to foods containing GMOs in a proportion equal to or less than 0.9 percent of the food ingredients considered individually, provided their presence is adventitious or technically unavoidable. Above this level, all products must be labeled using the following wording:

Where the food consists of more than one ingredient, the words “genetically modified” or “produced from genetically modified [name of ingredient]” must follow in brackets immediately after the ingredient concerned. A compound ingredient with a GM component should be labeled “contains [name of ingredient] produced from genetically modified [name of organism].”

2. John Hammond’s question about label an alcoholic beverage made from GM grain – the way I read it, YES you do label it as GM.

Where there is no list of ingredients, the words “genetically modified” or “produced from genetically modified [name of ingredient]” must appear clearly in the labeling.

Example 1: “a spirit containing caramel produced from genetically modified corn.”

Example 2: “genetically modified sweet corn.”

3. The question was about GAP and other retailer required certs in Europe – the following statement about sums up all I know about this.

“the most common required by export markets include programs such as Good Agricultural Practices (GAP), Good Manufacturing Practices (GMP), Good Hygienic Practices and Hazard Analysis and Critical Control Point system (HACCP) and Global GAP. Secondary certifications related to sustainability are starting to be requested more often. These include Fair Trade and others related to agrochemical traceability, which is often demanded by European markets.”

We can look into these secondary certifications and see what is developing. It would be interesting and useful.

4. The question about seed import rules etc. - this one will require some research.

STEP ONE is identify the species. Some but not all seed will require a phytosanitary certificate. STEP TWO is look at the European Seed Certification Agencies Association <http://www.escaa.org/> and go over the EU certification regulations, look at what country you are importing into, and look at that country’s seed certification standards. To see if you need certification, based on your product, and if so, how to go about it.